

1 know Harold Ray?

2 A. No, sir, I do not.

3 Q. Have you ever seen Harold Ray as a
4 moderator on Channel 45?

5 A. No, sir.

6 Q. Same answer applied to Brenda Ray?

7 A. Correct.

8 Q. Do you know Captain Ronald Busroe of the
9 Broward County Salvation Army?

10 A. Very well, sir.

11 Q. Would you read over that description and
12 give me your evaluation of the significance or
13 worthwhileness of that program?

14 A. From this description, it seems that they
15 discussed the situation of the homelessness.

16 Q. Do you have an opinion as to the value of
17 the services provided by Captain Busroe in Broward
18 County?

19 A. Yes, I do.

20 Q. What is your opinion?

21 A. I was taught by a very well attentive
22 parent that if you don't have something positive to
23 say, you say nothing. So, I have nothing to say
24 about Captain Busroe.

25 Q. Would you look at Page 9 of this exhibit?

1 A. Yes.

2 Q. Would you look at the program description
3 for January 11, 1991? Would you agree that that
4 description is of a program that addresses the issue
5 of what is called here "the inner city homeless
6 population"?

7 A. I once again would only have to go with the
8 comments of the topic. I don't know the -- Looking
9 at it, I'm not sure how substantial the conversation
10 was, but it does state very clearly they held a
11 conversation about inner city homeless population.

12 Q. The same would apply to the next
13 description; the program of January 1, 1991, request
14 Pastor Richard and Patricia Risi?

15 A. Correct.

16 Q. Would the same comment apply to the
17 statement on Page 10 for the program of January 2,
18 1991? Do you want to take the time to read it?

19 A. Same.

20 Q. You would agree that program addresses the
21 issue of homelessness in Broward County or in Dade
22 County?

23 A. I would only agree that it's a discription
24 of a topic being discussed that dealt with homeless
25 individuals and this topic does not categorize

1 Broward County. It only speaks of Hialeah and Miami.

2 Q. Which is Dade County?

3 A. Yes, sir.

4 Q. And would you look at Page 13 and the
5 description of the program called South Florida
6 Public Report Number 8 on June 1, 1991. Would you
7 take a moment to read that to yourself?

8 A. I don't have Page 13, sir.

9 MR. MULLIN: Off the record.

10 (Whereupon, an off the record discussion
11 was held.)

12 Q. (By Mr. Mullin) Directing your attention
13 to Trinity Exhibit 12, the page that I have marked is
14 Page 13. It is the date of June 1, 1991. I would
15 ask you to just familiarize yourself with that.

16 You would agree that that program from the
17 description you've seen of it addresses the issue of
18 homelessness?

19 A. Yes. I would agree that the topic was
20 addressed on that particular date and time.

21 Q. And had you read or consulted what is in
22 here, Trinity Exhibit 12, on housing and homelessness
23 prior to the time you signed your statement, your
24 Declaration?

25 A. Correct.

1 Q. Had you been sent by Mr. Honig or anyone
2 else a list of programs indicating that the topic
3 discussion had were "Discrimination Ethnic and
4 Minority Groups Immigration." Do you recall anything
5 like that?

6 A. I would ask that you repeat the question,
7 please.

8 Q. Had you received from Mr. Honig prior to
9 the time you signed your statement any list of
10 programs where the topics were "Discrimination,
11 Ethnic and Minority Groups, Immigration." Does that
12 sound familiar?

13 A. I was sent a number of exhibits in
14 reference to this matter. I could only state to you
15 that I particularly recall the one that we just
16 discussed on homelessness.

17 I have a vague recollection of the one
18 dealing with AIDS, but I could not specifically state
19 that that was a document that I received.

20 Q. Can you tell me, sir, in the calendar year
21 1991, going back there first, how much viewing you
22 did of Channel 45?

23 A. Very rarely.

24 Q. Would the same answer apply to the calendar
25 year 1990?

1 A. Uh-huh, very rarely.

2 Q. Also 1989?

3 A. Yes, sir.

4 Q. Also 1988?

5 A. Yes, sir.

6 Q. Also 1987?

7 A. Yes, sir.

8 Was there a Channel 45 in '87?

9 Q. Sir?

10 A. Was there a Channel 45 in '87?

11 Q. Yes.

12 A. Okay.

13 Q. I'm going to ask you if certain names mean
14 anything to you and in asking the questions, I may
15 reveal my own ignorance of South Florida. Please
16 bear with me.

17 Do you know a Timothy L. Ball with the
18 Oakland Park Police Department?

19 A. I read the name in the newspaper articles.
20 I don't know him personally, no, sir.

21 Q. Do you know a Dr. Robert G. Barnes, who is
22 associated with an organization called Sheridan
23 House?

24 A. No, sir, I do not.

25 Q. Do you know anything about Sheridan House?

1 A. I've heard of Sheridan House, but I don't
2 know very much about it.

3 Q. Do you know a person identified as
4 Cleveland Bell, the III associated with an
5 organization called Riverside House?

6 A. I've had the occasion to meet him, but I
7 don't know him.

8 Q. You don't know him?

9 A. No. We've met, but I don't have a
10 relationship of any sort to form an opinion of him.

11 Q. You know nothing about him or his
12 activities although you have met him?

13 A. Yes.

14 Q. Do you know a Pastor George M. Beney?

15 A. No, sir.

16 Q. Do you know a Mrs. Ruthor M. Cartor?

17 A. Yes, I do.

18 Q. Do you know that she has a position with
19 the Broward County Commission of Alcohol and Drug
20 Abuse Division?

21 A. Very well respected lady in this community.

22 Q. Have you ever discussed Channel 45 with
23 her?

24 A. No, sir.

25 Q. Do you know a man named Ernest Raymond or

1 Ray Hughes?

2 A. No, sir.

3 Q. Do you know a Michael Lewandowski from
4 Pompano Beach?

5 A. No, sir.

6 Q. Do you know Gary G. Morton of the Broward
7 County sheriff's office?

8 A. Spell the last name, please.

9 Q. Morton, M-o-r-t-o-n.

10 A. No, sir.

11 Q. The answer is no?

12 A. No, sir.

13 Q. Do you know a Mrs. Susan Sissman of the
14 Broward County branch of Daily Food Bank?

15 A. I read her name in the paper, but I have
16 not met her.

17 MS. ROBINSON: May I ask where counsel is
18 headed with this line of questioning?

19 MR. MULLIN: I just want to identify
20 whether he knows any of these people who may
21 also be witnesses in this proceeding and I want
22 to know anyone he does know, whether he's
23 discussed Channel 45 with them. This is for
24 purposes of discovery.

25 Q. (By Mr. Mullin) Do you know a Lonnie

1 Tolbert?

2 A. Is that a reverend?

3 Q. Yes.

4 A. I read the name, seen him in various
5 articles, but I don't know him.

6 Q. You never discussed Channel 45 with him?

7 A. No, sir. I have not discussed Channel 45
8 with anyone. It's not a topic of discussion.

9 Q. Do you know an Elizabeth Ann Wilson,
10 manager of the First Baptist Church of Fort
11 Lauderdale?

12 A. Yes.

13 Q. Have you --

14 A. No.

15 Q. You have not discussed with her?

16 A. No.

17 Q. Do you know a James Edward Woods, another
18 reverend in Fort Lauderdale?

19 A. What church?

20 Q. Issues of Life Ministry?

21 A. No, sir.

22 Q. In your statement in Paragraph 6, you state
23 that Channel 45 has never sent a representative to
24 cover or attend an event of interest to me.

25 As a matter of fact, you were aware, are

1 you not, that Channel 45 doesn't cover events in the
2 sense that stations with local news programs such as
3 4, 7 and 10 do?

4 A. Absolutely. I'm aware of that, sir.

5 Q. You're aware that Channel 45's programming
6 is largely devoted to discussion programs, is that
7 correct?

8 A. Correct, sir.

9 MR. MULLIN: That's all I have. I thank
10 you very much.

11 MS. ROBINSON: No redirect.
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AND FURTHER DEPONENT SAITH NOT

CARLTON MOORE

SWORN TO AND SUBSCRIBED TO before me on this
day of , 1993, in the City of
Fort Lauderdale, Broward County, Florida.

Notary Public - State of Flo


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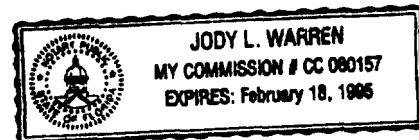
CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF BROWARD)

I, the undersigned authority, certify that
CARLTON MOORE personally appeared before me and
was duly sworn.

WITNESS my hand and official seal this
5th day of October, 1993.


JODY L. WARREN
Notary Public - State of Florida
My Commission Expires: 2/18/95



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CERTIFICATE

STATE OF FLORIDA:

SS.

COUNTY OF BROWARD:

I, JODY L. WARREN, being a Shorthand Reporter
and a Notary Public for the State of Florida at
Large, do hereby certify that I was authorized to and
did stenographically report the foregoing deposition;
and that said transcript is a true record of the
testimony given by the witness.

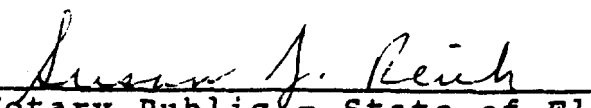
I further certify that I am not an attorney or
counsel of any of the parties, nor a relative or
employee of any attorney or counsel connected with
the action, nor financially interested in the action.

Dated this 5th day of October, 1993.


JODY L. WARREN

STATE OF FLORIDA)
COUNTY OF BROWARD)

The foregoing certificate was acknowledged
before me this 5th day of October, 1993, by
Jody L. Warren, who is personally known to me.


Notary Public - State of Florida



/ SALADA 8

Saled Ex. 8 pg. 1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In Re Applications of

MM Docket No. 93-75

TRINITY BROADCASTING OF FLORIDA,
INC.

BRCT-911001LY

For Renewal of License for
Television Station WHFT (TV)
Miami, Florida

GLENDAL E BROADCASTING COMPANY

BPCT-911227KE

633 South Federal Highway
Fort Lauderdale, Florida
September 13, 1993
Monday, 3:55 p.m.

DEPOSITION OF KATHLEEN SHEA

Taken before Jody L. Warren, Shorthand
Reporter, Notary Public for the State of Florida at
Large, pursuant to Notice of Taking Deposition filed
in the above cause.

COPY

Federal Communications Commission

Docket No. 93-75, Exhibit No. 501

Presented by Hanky

DEC 3-1993

Identified

Received

Rejected

DEC 3-1993

Dispositions

Reporter

DEC 3-1993

Date

1 APPEARANCES:

2

3 MULLIN, RHYNE, EMMONS & TOPEL
4 By: EUGENE F. MULLIN, ESQUIRE
on behalf of Trinity.

5 RONDA R. ROBINSON, ESQUIRE
6 on behalf of SALAD.

7

8

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10

I N D E X

11

Witness

Direct

Cross

12

KATHLEEN SHEA

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EXHIBITS

Trinity Exhibits 24 and 25

3

17

SALAD Exhibit 7

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1 (Thereupon, Trinity Exhibits 24 and 25
2 were marked for identification by the
3 court reporter.)

4 Thereupon:

5 KATHLEEN SHEA

6 was called as a witness and, having been first
7 duly sworn, was examined and testified as follows:

8 DIRECT EXAMINATION

9 BY MS. ROBINSON:

10 Q. Could you state your name and address for
11 us, please?

12 A. My name is Kathleen Shea and I live at 3163
13 Jackson Avenue in Coconut Grove.

14 Q. Could you describe the document that I'm
15 placing before you?

16 A. This is my resume.

17 MS. ROBINSON: I'd like to have this resume
18 marked as SALAD deposition Exhibit Number 7.

19 (Thereupon, the above-referred to document
20 was marked as SALAD Exhibit 7 for
21 identification by the court reporter.)

22 MS. ROBINSON: Your witness, please.

23 CROSS EXAMINATION

24 BY MR. MULLIN:

25 Q. Dr. Shea, I have had marked as Trinity

1 Exhibit 24, the notice of deposition to you in this
2 proceeding and as Trinity Exhibit Number 25, the
3 subpoena duces tecum served on you in this proceeding
4 and attached to 25 as part of the subpoena is your
5 Declaration.

6 A. May I look at them?

7 Q. Please do. Thank you.

8 Did you receive both of those documents,
9 that is Trinity 24 and 25 from Mr. Honig?

10 A. Yes, I did.

11 Q. Would you look at 25, in particularly at
12 the first attachment, I think it's called Exhibit A,
13 and would you look at the descriptions in paragraphs
14 number one, two and three at the top of the page?

15 A. Uh-huh.

16 Q. And tell me if you have in your possession
17 any documents that come within the scope of those
18 paragraphs.

19 A. The summaries that Mr. Honig had sent to
20 me, the education summary, I had but destroyed before
21 I came to this meeting.

22 Q. I'm going to show you what we already
23 marked here as Trinity Exhibit Number 23 which
24 purports to be a list of Illustrative Programming On
25 Channel 45 in the area of "Education/Schools" and I

1 would ask you if that is the summary to which you
2 just refer?

3 A. That is.

4 Q. I should tell you that's the document as I
5 received it from Mr. Honig changed in only this
6 respect, I put the page numbers for convenience of
7 reference that we may be referring to.

8 A. Okay.

9 Q. Did you not also receive from Mr. Honig a
10 memorandum addressed to Colleagues and Friends
11 attached to which was a one page list of questions?

12 A. Yes, I did.

13 Q. Now, did you make any written responses to
14 those questions?

15 A. The only written response I made was in my
16 statement.

17 Q. You have no notes that you kept prior to
18 preparing your statement?

19 A. Yes, but I destroyed them. I was traveling
20 when I prepared my statement and I destroyed my notes
21 and the summaries and kept only my written statement.

22 Q. Let's look at the statement which is in
23 Exhibit 25 attached to the subpoena. Who actually
24 typed it?

25 A. I did not. I faxed him a handwritten copy.

1 Q. And he faxed something back to you in
2 typing?

3 A. In typing, which I signed.

4 Q. Did you make any changes in it before you
5 signed it?

6 A. No.

7 Q. And you have no prior drafts of this
8 document, this document being your Declaration?

9 A. That's correct.

10 Q. Are you able to give us a round estimate as
11 to how many children in Dade County are
12 educated - how many elementary children are educated
13 other than in public schools?

14 A. Other than in public schools?

15 Q. Yes.

16 A. I don't know the exact figure. I would say
17 it's -- Other than in public schools including
18 Catholic schools and private nondenominational and so
19 forth?

20 Q. Yes.

21 A. I would say under 50,000.

22 Q. Under fifty?

23 A. (Witness nods in the affirmative.)

24 Q. And, of course, sending one's child to a
25 nonpublic school is legal in the State of Florida?

1 A. As far as I know, yes.

2 Q. And teaching a child at home is also legal
3 in the State of Florida, is it not?

4 A. To my understanding, it is.

5 Q. Do you have any estimate as to the number
6 of children in Dade County who are educated in
7 school?

8 A. Home school?

9 Q. Yes.

10 A. I would not want to venture a guess. I
11 don't know.

12 Q. Would you put it in the hundreds or in the
13 thousands?

14 A. Oh, in the thousands.

15 Q. In the thousands?

16 A. (Witness nods in the affirmative.)

17 Q. What do you base that on?

18 A. The population of Dade County and the -- I
19 would say if the Dade County schools are approaching
20 half a million students, 400,000 some odd students,
21 that one percent of them could be - one percent of
22 that number could be home school.

23 Q. Have you, yourself, in your professional
24 capacity or in your personal experience investigated
25 the quality of education in nonpublic schools?

1 A. Investigated the quality of education?

2 Q. Or --

3 A. No.

4 Q. Have you on the basis of study or on the
5 basis of personal experience gained any knowledge
6 about the quality of education in nonpublic schools?

7 A. Well, could you be more specific with
8 regard to quality?

9 Q. How good it is.

10 A. Well, I guess because I'm an educator,
11 there are many different measures of quality and if
12 you talk about graduation rates as being one measure
13 of quality --

14 Q. Well, do you know anything about nonpublic
15 elementary schools?

16 A. I'm a product of nonpublic education.

17 Q. Are you a product of Catholic Parochial
18 schools?

19 A. Yes, sir.

20 Q. What kind of high school did you attend?

21 A. Catholic girl's high school.

22 Q. And then you attended the University of
23 Dayton?

24 A. A Catholic college.

25 Q. Would you look at Trinity Exhibit 23.

1 Ronda, again, could we do as we did before
2 and let her use - no, I'm going to let her use my
3 copy and I'm going to use the record.

4 A. Page 23?

5 Q. No, Exhibit 23. I want to ask you about
6 some particular program on Exhibit 23, but before we
7 do, you agree, do you not, that the fact that a
8 school is not a public school does not make it, per
9 say, a bad school?

10 A. Yes, sir, I agree.

11 Q. Would you look at Exhibit 23 on Page 2. I
12 direct your attention to the program description
13 appearing at the bottom of Page 2 and going over to
14 Page 3, the description of a program broadcast on
15 June 3, 1991.

16 Would you just review that to yourself,
17 please?

18 A. Okay.

19 Q. Did you see that program on Channel 45 when
20 it was broadcast?

21 A. No, sir, not that I recall.

22 Q. Have you ever seen any program on Channel
23 45?

24 A. Yes, sir, I have.

25 Q. Did you do any viewing of Channel 45 in the

1 calendar year 1991? Unfortunately, we're time
2 limited in this proceeding.

3 A. Not that I recall. I may have, but not
4 that I recall.

5 Q. What about 1990, same answer?

6 A. Same answer.

7 Q. 1989 same answer?

8 A. Same answer.

9 Q. 1988 same answer?

10 A. Same answer.

11 Q. 1987 same answer?

12 A. Same answer.

13 Q. To pin it down, you did review the written
14 materials in Trinity Exhibit 23 which you have in
15 front of you. As you reviewed it, did it occur to
16 you that you had seen any of the programs described
17 there?

18 A. Actually, I wondered that.

19 Q. What conclusion did you reach?

20 A. That I could not specifically recall
21 exactly these programs, but it's possible.

22 Q. It's fair to say then that all you know
23 about any of the programs described in this exhibit
24 is what is described in this exhibit?

25 A. Yes, sir.

1 Q. Now, let's go back to Page 2, the program
2 on June 3, 1991 which you have just reviewed. You
3 would agree, would you not, that that program
4 addresses - and I'm using the word addressed in the
5 sense you used it in the line of Paragraph 4 of your
6 Declaration - that that program addresses an
7 educational need?

8 A. Yes, sir, I would.

9 Q. Would you look at Page 12 of the exhibit,
10 please. Directing your attention to the program in
11 the middle of the page broadcast on the first
12 occasion on March 1, 1991. Would you just review
13 that to yourself?

14 A. Yes, sir.

15 Q. You would agree, would you not, that that
16 program addresses, using the word in the same sense,
17 an educational need?

18 A. No, I would not.

19 Q. Can you explain that answer to me?

20 A. Well, actually, it was because you said
21 using the word addresses in the same sense that I had
22 used it with the prior summary.

23 The thing that enabled me to say it
24 addresses a need was the statement that the
25 Illiteracy Program has two Dade County certified